

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
LITIGATION

) Civil Action No. 04-10294-DPW
) (Lead Case)

)

)

) **LEAD PLAINTIFF'S UNOPPOSED**
) **APPLICATION FOR LEAVE TO**
) **FILE A SINGLE OVERSIZED REPLY**
) **MEMORANDUM IN SUPPORT OF**
) **ITS MOTION FOR CLASS**
) **CERTIFICATION**

)

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)

THIS DOCUMENT RELATES TO:
ALL CASES

By electronic Order entered October 2, 2006, the Court set forth the briefing schedule for Lead Plaintiff BPI Global Asset Management LLP's motion for class certification. In that Order, the Court permitted Lead Plaintiff to file a reply memorandum by February 7, 2007. Pursuant to Local Rule 7.1(b)(4), Lead Plaintiff hereby seeks leave to file an oversized reply memorandum.

Lead Plaintiff filed its motion for class certification on July 31, 2006. On January 5, 2007, the Defendants filed two separate opposition briefs: (1) a joint brief by Defendants Sonus Networks, Inc. and Hassan Ahmed (which was accompanied by more than 75 pages of exhibits) (Doc. Nos. 180, 181); and (2) a separate brief with exhibits by Defendant Stephen Nill (Doc. No. 182). Lead Plaintiff believes that a single memorandum of law addressing both opposition briefs would benefit the Court and parties, due to the overlap of facts and issues raised in the

Defendants' briefs. Thus, instead of filing two separate reply memoranda of up to 20 pages each (40 pages in total), Lead Plaintiff requests leave to file a single reply memorandum not to exceed thirty (30) pages.

Counsel for all three Defendants have advised Lead Plaintiff that they do not oppose this request.

Dated: February 1, 2007

GOLD BENNETT CERA & SIDENER LLP

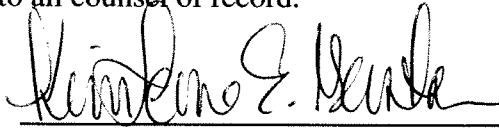
By /s/ Solomon B. Cera

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CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby certify that on February 1, 2007, I electronically filed the foregoing document: **“LEAD PLAINTIFF’S UNOPPOSED APPLICATION FOR LEAVE TO FILE A SINGLE OVERSIZED REPLY MEMORANDUM IN SUPPORT OF ITS MOTION FOR CLASS CERTIFICATION”** with the Clerk of the Court using the CM/ECF System which sent notification of such filing to all counsel of record.

A handwritten signature in black ink, appearing to read "KimLane E. Gantan", is written over a horizontal line.

KimLane E. Gantan